

Kevin L. Hernandez, Esq.  
Nevada Bar No. 12594  
**LAW OFFICE OF KEVIN L.  
HERNANDEZ**  
2510 Wigwam Parkway, Suite 206  
Henderson, Nevada 89074  
T: (702) 563-4450  
F: (702) 552-0408  
[kevin@kevinhernandezlaw.com](mailto:kevin@kevinhernandezlaw.com)  
*Attorney for Plaintiff*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

JERHONDA KIRK-GIBSON, an individual;  
  
Plaintiff,

v.

BANK OF AMERICA, N.A., a national banking  
association; PENNSYLVANIA HIGHER  
EDUCATION ASSISTANCE AGENCY doing  
business as AMERICAN EDUCATION  
SERVICES, a foreign non-profit corporation;  
EQUIFAX, INC., a foreign corporation;  
EXPERIAN INFORMATION SOLUTIONS,  
INC., a foreign corporation; TRANS UNION  
LLC, a foreign limited-liability company;  
  
Defendants.

Case No.: 2:16-cv-02371-JCM-PAL

**STIPULATION AND ORDER FOR  
DISMISSAL OF DEFENDANT  
PENNSYLVANIA HIGHER  
EDUCATION ASSISTANCE AGENCY  
WITH PREJUDICE**

Plaintiff, Jerhonda Kirk-Gibson (“Plaintiff”), and Defendant, Pennsylvania Higher  
Education Assistance Agency (“PHEAA”) (collectively referred to as the “Parties”) have  
resolved all claims, disputes, and differences between the Parties;

///

///

///

///

///

///

///

///

Therefore, the Parties, by and through their respective attorneys of record, and subject to the court's approval, respectfully request dismissal of the above-captioned matter with prejudice under FRCP 41(a) as to PHEAA, with Plaintiff and PHEAA bearing their own attorneys' fees and costs incurred in this action.

Respectfully Submitted.

Dated: June 28, 2017

Dated: June 28, 2017

**LAW OFFICE OF  
KEVIN L. HERNANDEZ**

**HOLLAND & HART LLP**

/s/ Kevin L. Hernandez  
Kevin L. Hernandez, Esq.  
Nevada Bar No. 12594  
2510 Wigwam Parkway, Suite 206  
Henderson, Nevada 89074  
[kevin@kevinhernandezlaw.com](mailto:kevin@kevinhernandezlaw.com)  
*Attorney for Plaintiff*

/s/ Patrick J. Reilly  
Patrick J. Reilly, Esq.  
Nevada Bar No. 6103  
9555 Hillwood Drive, 2<sup>nd</sup> Floor  
Las Vegas, Nevada 89134  
[preilly@hollandhart.com](mailto:preilly@hollandhart.com)  
*Attorneys for Defendant Pennsylvania Higher  
Education Assistance Agency*

**ORDER OF DISMISSAL WITH PREJUDICE AS TO DEFENDANT PHEAA WITH  
PREJUDICE**

Pursuant to the stipulation of the Parties under FRCP 41(a), PHEAA is dismissed with prejudice, and the Parties will bear their own attorneys' fees and costs incurred in this action.

**IT IS SO ORDERED:**

  
UNITED STATES DISTRICT JUDGE

DATED: July 3, 2017

**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing **STIPULATION AND ORDER FOR DISMISSAL OF DEFENDANT PENNSYLVANIA HIGHER EDUCATION ASSISTANCE AGENCY WITH PREJUDICE** was electronically served to the following parties:

Patrick J. Reilly, Esq.  
**HOLLAND & HART LLP**  
9555 Hillwood Drive, 2<sup>nd</sup> Floor  
Las Vegas, Nevada 89134  
[preilly@hollandhart.com](mailto:preilly@hollandhart.com)  
*Attorneys for Defendant Pennsylvania Higher  
Education Assistance Agency*

Dated: June 28, 2017

/s/ Caesy Morales.  
An Employee of the Law Office of Kevin L.  
Hernandez